

UNITED STATES DISTRICT COURT  
for the  
District of New Jersey

United States of America )  
v. )  
Michael Gordon ) Case No.  
) 23-mj-7089 (EAP)  
)  
)  
)  
)

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of \_\_\_\_\_ in the county of Burlington in the \_\_\_\_\_ District of New Jersey, the defendant(s) violated:

### *Code Section*

*Description of Offenses*

18 U.S.C. § 2252A(a)(5)(B) Possession of child pornography

This criminal complaint is based on these facts:

See Attachment B.

Continued on the attached sheet.

James Murphy  
Complainant's signature

Laura Hurley, Special Agent, HSI

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by

(specify reliable electronic means)

Date: 11/14/2023

Elizabeth A. Paul  
Judge's signature

City and state: Camden, New Jersey

Honorable Elizabeth A. Pascal, U.S.M.J.

*Printed name and title*

ATTACHMENT A

Possession of Child Pornography

On or about November 14, 2023, in Burlington County, in the District of New Jersey, and elsewhere, the defendant,

MICHAEL GORDON

did knowingly possess material that contained at least three images of child pornography, as defined in Title 18, United States Code, Section 2256(8), which images had been shipped and transported using any means and facility of interstate and foreign commerce, had been shipped and transported in and affecting interstate and foreign commerce, and were produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

**ATTACHMENT B**

I, Laura Hurley, being first duly sworn, do hereby depose and say:

1. I am a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), assigned to the Assistant Special Agent in Charge Office located in Mount Laurel, New Jersey. I am fully familiar with the facts set forth herein based on my own investigation, my discussions with other law enforcement officers, and my review of reports, documents, and other items of evidence. Where statements of others are related herein, they are related in substance and in part. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

**Background**

2. At all times relevant to this Complaint, defendant Michael Gordon (“Gordon”) was a resident of Burlington County, New Jersey. On December 4, 2019, Gordon was convicted of distribution of child pornography and was sentenced to a term of 5 years imprisonment with 2 ½ years parole ineligibility, followed by parole supervision for life.

**The Investigation**

3. On November 14, 2023, law enforcement executed a search warrant at Gordon’s residence, located in Burlington County, New Jersey (the “Premises”). The warrant authorized the search and seizure of evidence of possession and distribution of child pornography, in violation of 18 U.S.C. § 2252A.

4. Upon executing the search warrant, law enforcement discovered two persons inside the Premises: Gordon and Witness-1. The search of the Premises uncovered multiple electronic devices, including one (1) Samsung tablet and one (1) microSD card. A forensic search of the microSD card revealed several deleted videos stored on the device. A review of more than three of these files revealed that they were in fact videos of child pornography, including depictions of prepubescent minors engaged in sexually explicit conduct, as defined in 18 U.S.C. § 2256. A description of two of the videos is as follows:

- a. An AVI video file<sup>1</sup> which plays for approximately 2 minutes and 44 seconds in duration. The video depicted two prepubescent females, seen with their pants pulled down exposing their genitalia to the camera. At approximately 00:59, the females manually masturbate one another with their hands. At approximately 01:58, one of the females performs oral sex on the other female’s genitalia.

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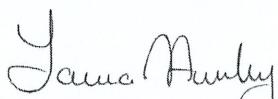
<sup>1</sup> The filenames in Paragraph 4a and b are known to me. The filenames are omitted from this affidavit to avoid publicly identifying any victims in this matter.

b. An AVI video file which plays for approximately 31 seconds in duration. The video depicted a nude prepubescent female. The female appears to be applying white lotion to the anus of an unknown nude male.

5. Gordon agreed to give a statement to law enforcement, which was audio recorded, after being advised of his Miranda rights. Gordon told law enforcement in substance and in part that he resided at the Premises and that the Samsung tablet and microSD card belonged to him. Gordon stated that he used the tablet to download and view child pornography. He also stated that he attempted to delete the child pornography from the devices after viewing them.

6. Law enforcement also interviewed Witness-1. Witness-1 stated that she also resided at the Premises with Gordon. Witness-1 further stated that only the two of them lived at the Premises.

Respectfully submitted,

  
\_\_\_\_\_  
Laura Hurley, Special Agent  
Homeland Security Investigations

This affidavit was sworn out via telephone, in compliance with Federal Rule of Criminal Procedure 4.1 on this 14<sup>th</sup> day of November, 2023.



Hon. Elizabeth A. Pascal  
United States Magistrate Judge